

December 5, 2001

Tom Sipress  
D & S Industries, Inc.  
P.O. Box 870  
Bristol, IN 46507

Re: Registered Construction and Operation Status,  
**0039-14864-00561**

Dear Mr. Sipress:

The application from D & S Industries, Inc., received on September 18, 2001, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following screw surface coating operation, to be located at 705 Division Street, in Bristol, Indiana 46507, is classified as registered:

- (a) Four (4) high volume low pressure (HVLP) surface coating booths, identified as SV-1, SV-2, SV-3, and SV-4, respectively, applying coatings to screws with a maximum combined production rate of 125,000 screws per hour, with particulate emissions from each booth controlled by a dry filter system and emissions exhausted through Stacks SV-1, SV-2, SV-3, and SV-4, respectively.
- (b) One (1) high volume low pressure (HVLP) surface coating booth, identified as SV-7, applying coatings to miscellaneous metal parts, with particulate emissions controlled by a dry filter system, and emissions exhausted through Stack SV-7.
- (c) Two (2) 0.075 MMBtu/hr natural gas-fired unit heaters, identified as SV-5 and SV-6, and
- (d) One (1) 0.20 MMBtu/hr natural gas-fired drying oven, identified as SV-8.

The following conditions shall be applicable:

1. Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

2. Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions from the paint booths shall not exceed the limits established utilizing the following equation:

$$E = 4.10 * P^{0.67}$$

where: E = rate of emission in pounds per hour,  
P = process weight in tons per hour

### 3. Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

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Pursuant to 326 IAC 8-2-9, the owner or operator shall limit the volatile organic compound (VOC) content of the coatings applied to the metal parts and/or products at paint booths SV-1, SV-2, SV-3, SV-4, and SV-7, to three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator, for the forced warm air dried coatings.

### 4. Surface Coating Cleanup [326 IAC 8-2-9]

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Pursuant to 326 IAC 8-2-9, the owner or operator shall direct all solvents sprayed from the application equipment of the paint booths SV-1, SV-2, SV-3, SV-4, and SV-7 during cleanup or color changes into containers. Said containers shall be closed as soon as the solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that minimizes evaporation.

### 5. General Reduction Requirements, VOC

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Should the owner or operator make any changes or modifications which would increase the source VOC potential to emit to twenty-five (25) tons per year or more, the owner or operator shall obtain approval from the Indiana Department of Environmental Management, Office of Air Quality, prior to the change(s).

### 6. General Reduction Requirements, HAPs

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Should the owner or operator make any changes or modifications which would increase the source single and combined HAPs to greater than or equal to 10 and 25 tons per year, respectively, the owner or operator shall obtain approval from the Indiana Department of Environmental Management, Office of Air Quality, prior to the change(s).

### 7. Operation of Control Equipment

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The dry filter systems of the paint booths SV-1, SV-2, SV-3, SV-4, and SV-7 shall be in operation at all times when the respective paint booths are in operation.

### 8. Compliance Determination, VOC Content Limit

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To determine compliance with the VOC content limit of Condition 3, the owner or operator shall, for paint booths SV-1, SV-2, SV-3, SV-4, determine the worst case VOC content in pounds per gallon coating, less water, as applied, of each coating applied at the respective paint booths. Said VOC content shall be determined by completing each applicable coating's "As Supplied" and "As Applied" VOC data sheets.

Should the VOC content of any coating applied at the booths be increased to a level that exceeds the value determined in the most recent version of the respective VOC data sheets, a new coating is added, or a replacement coating is introduced, the owner or operator shall complete new "As Supplied" and "As Applied" VOC data sheets for the applicable coating(s).

### 9. Record Keeping

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To document compliance with the VOC content limit of Condition 3, the owner or operator shall maintain copies of the "As Supplied" and "As Applied" VOC data sheets required in Condition 8.

Should the owner or operator terminate the use of any coating(s) subject to the requirements of this Condition, the owner or operator need not maintain records of the obsolete coating(s).

#### 10. Annual Certification Requirement [326 IAC 2-6]

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To comply with the requirements of 326 IAC 2-6, the owner or operator shall submit an annual emission statement that contains, at a minimum:

(a) source identification information including the full name, physical location, and mailing address of the facility, the source latitude and longitude, and the SIC code.

(b) source operating data including:

(1) the percent annual throughput by quarter for the following quarters:

- (A) December through February,
- (B) March through May,
- (C) June through August, and
- (D) September through November,

(2) the following information regarding the normal operating schedule:

- (A) the hours of operation per day,
- (B) the hours of operation per year,
- (C) the days of operation per week,

(3) the following information regarding the peak ozone season:

- (A) the days of operation per week, if different from the normal operating schedule, and
- (B) the weeks of operation during the peak ozone season.

The peak ozone season for Indiana is June through August.

(4) the annual fuel or process weight and units used.

(c) emission information including:

(1) the estimated actual volatile organic compound (VOC) and oxides of nitrogen (NO<sub>x</sub>) emissions at the segment level, in tons per year for an annual emission rate and pounds per day for a typical ozone season day. Actual emission estimates shall include upsets, downtime, and fugitive emissions, and must follow an emission estimation method,

(2) if emissions were calculated utilizing an emission factor, the emission factor used, with said emission factor being:

- (A) one of the emission factors established in the AP-42, "Compilation of Air Pollutant Emission Factors", Volume 1, Fourth Edition, September 1985\*, or
- (B) any alternative emission factor that has been approved by the Office of Air Quality and U. S. EPA,

\* These documents are incorporated by reference and are available for review at the Office of Air Quality, Department of Environmental Management, Indiana Government Center-North, 100 Senate Avenue, Indianapolis, Indiana or for purchase from U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards, Research Triangle Park, North Carolina 27711.

- (3) the aerometric information retrieval system (AIRS) facility subsystem estimated method code,
  - (4) the calendar year for the emissions, and
  - (5) the source classification code (SCC) number.
- (d) control equipment information, including:
- (1) the current primary and secondary AIRS facility subsystem control equipment identification codes, and
  - (2) the current control equipment efficiency percentage. The actual efficiency should reflect the total control efficiency from all control equipment. If the actual control efficiency is unavailable, the efficiency designed by the manufacturer or the efficiency imposed by a permit may be used.
- (e) process rate data including the peak ozone season daily process rate, as prescribed by the AIRS facility subsystem source classification code table.
- (f) certification that the information contained in the statement is accurate to the best knowledge of the individual certifying the statement. The certification shall include the full name, title, signature, date of signature, and telephone number of the certifying individual. The certifying individual shall be employed by the company and shall take legal responsibility for the accuracy of the emission statement.

The emission statement does require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

In addition, the certification required in this Condition shall be received by the Office of Air Quality no later than April 15 of each year with said certification being submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

This registration is the first approval issued to this source. The source may operate according to 326 IAC 2-5.5.

In addition, an authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3)). The annual notice shall be submitted to:

Compliance Data Section  
Office of Air Quality  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, IN 46206-6015

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original Signed by Paul Dubenetzky  
Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

SDF

cc: File - Elkhart County  
Elkhart County Health Department  
Air Compliance - Paul Karkiewicz and Tony Pelath  
Northern Regional Office  
Permit Tracking - Janet Mobley  
Technical Support and Modeling - Michele Boner  
Compliance Data Section - Karen Nowak

<b>Registration Annual Notification</b>
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This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3)

<b>Company Name:</b>	<b>D &amp; S Industries, Inc.</b>
<b>Address:</b>	<b>705 Division Street</b>
<b>City:</b>	<b>Bristol, IN 46507</b>
<b>Authorized individual:</b>	
<b>Phone #:</b>	
<b>Registration #:</b>	

I hereby certify that the screw surface coating operation is still in operation and is in compliance with the requirements of Registration **039-14864-00561**.

<b>Name (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

## **Indiana Department of Environmental Management Office of Air Quality**

### **Technical Support Document (TSD) for a Registration**

#### **Source Background and Description**

Source Name:	D and S Industries, Inc.
Source Location:	705 Division Street, Bristol, Indiana 46507
County:	Elkhart
Registration No.:	039-14864-00561
Permit Reviewer:	SDF

The Office of Air Quality (OAQ) has reviewed a Registration application from D and S Industries, Inc. relating to the operation of a screw surface coating operation, consisting of the following:

- (a) Four (4) high volume low pressure (HVLP) surface coating booths, identified as SV-1, SV-2, SV-3, and SV-4, respectively, applying coatings to screws with a maximum combined production rate of 125,000 screws per hour, with particulate emissions from each booth controlled by a dry filter system and emissions exhausted through Stacks SV-1, SV-2, SV-3, and SV-4, respectively.
- (b) One (1) high volume low pressure (HVLP) surface coating booth, identified as SV-7, applying coatings to miscellaneous metal parts, with particulate emissions controlled by a dry filter system, and emissions exhausted through Stack SV-7.
- (c) Two (2) 0.075 MMBtu/hr natural gas-fired unit heaters, identified as SV-5 and SV-6, and
- (d) One (1) 0.20 MMBtu/hr natural gas-fired drying oven, identified as SV-8.

#### **Existing Approvals**

This proposed registration is the source's first approval.

#### **Enforcement Issue**

There are no enforcement actions pending.

#### **Recommendation**

The staff recommends to the Commissioner that the Registration be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application.

#### **Emission Calculations**

##### **UNRESTRICTED POTENTIAL TO EMIT DUE TO THE MODIFICATION:**

The unrestricted potential to emit (UPTE) from the proposed source include emissions from the five (5) paint booths, two (2) unit heaters, and one (1) drying oven.

The following table summarizes the UPTE from the proposed equipment. The detailed UPTE calculations follow the summary table.

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Comb. HAPs (tons/yr)
Coating Booths	4.98	4.98	-	-	19.97	-	8.51
Combustion	neg.	neg.	neg.	0.20	neg.	0.10	neg.
<b>Total</b>	<b>4.98</b>	<b>4.98</b>	<b>neg.</b>	<b>0.20</b>	<b>19.97</b>	<b>0.10</b>	<b>8.51</b>

\* This value represents the combined HAP emissions from the coating booths.

**a. Five (5) Paint Booths:**

The following calculations determine the PM, PM10, VOC and HAP UPTE based on use of the worst case coating, toluene as the solvent, the respective maximum gal/unit, maximum units/hr, and chemical properties of the coatings as obtained from the MSDS, emissions before controls, and 8760 hours of operation.

Coating Booths SV-1, SV-2, SV-3, and SV-4 are identical in design, and coat similar parts. Coating booth SV-7 applies coatings to various metal parts using various different coatings, including the coatings and parts of the other four booths. Upon review of the coatings and parts applied, it is determined that the worst case scenario for the fifth coating booth is the application of the coatings to the parts applied in the other four booths. Therefore, all five coating booths are considered identical when determining the UPTE.

$$\text{VOC: VOC (tons/yr)} = \text{lb/gal} * \text{fraction VOC} * \text{gal/unit} * \text{unit/hr} * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb}$$

Coating	lb/gal	fraction VOC	maximum gal/unit	maximum unit/hr*	VOC (ton/yr)
Permaclad 2400	15.17	0.139	0.046	1	0.42
Coronado 80BSE	10.34	0.177	1.500	1	<b>12.02</b>
N-5751	21.05	0.166	0.016	1	0.24
N4033	12.65	0.270	0.008	1	0.12
Toluene	7.26	1.00	0.250	1	<b>7.95</b>
<b>Total</b>					<b>19.97</b>

\* The maximum combined production rate from all 5 booths is 125,000 units/hr. The amount of coating and solvent used to determine the UPTE is based on application of the specific coating or solvent to 125,000 parts (1 unit = 125,000 parts).

The worst case VOC emissions are 12.02 tons VOC/yr for the coatings and 7.95 tons/yr for the solvent.

The total VOC UPTE is the sum of the worst case coating and solvent emissions, or 19.97 tons VOC/yr.



$$12.02 \text{ tons VOC/yr} + 7.95 \text{ tons VOC/yr} = 19.97 \text{ tons VOC/yr}$$

**PM:**  $\text{PM (tons/yr)} = \text{lb/gal} * \text{gal/unit} * \text{unit/hr} * (1 - \text{wt\% VOC}) * (1 - 0.85) * 8760 \text{ hr/yr} * 1/2000$

Coating	lb/gal	maximum gal/unit	maximum unit/hr	Fraction VOC	transfer efficiency (TE)	PM* (ton/yr)
Permaclad 2400	15.17	0.046	1	0.139	85%	0.39
Coronado 80BSE	10.34	1.500	1	0.511	85%	<b>4.98</b>
N-5751	21.05	0.016	1	0.166	85%	0.18
N4033	12.65	0.008	1	0.270	85%	0.05
Toluene	7.26	0.250	1	1.000	85%	<b>0.00</b>

\* PM10 is determined to be equal to PM.

The worst case PM emissions from the coatings and solvent are 4.98 tons PM/yr and 0.00 tons PM/yr, respectively.

The total PM UPTE is the sum of the worst case coating and solvent emissions, or 4.98 tons PM/yr.

$$4.98 \text{ tons PM/yr} + 0.00 \text{ tons PM/yr} = 4.98 \text{ tons VOC/yr}$$

**HAP:**  $\text{HAP (tons/yr)} = \text{lb/hr} * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb}$

Coating	lb/hr	HAP (ton/yr)
Ethylbenzene	0.028	0.12
MIK	0.018	0.08
Toluene	1.840	<b>8.06</b>
Xylene	0.056	0.25
Cobalt	0.001	neg.
<b>Total</b>		<b>8.51</b>

The worst case single HAP UPTE is determined to be 8.06 tons/yr. The combined HAP UPTE is determined to be 8.51 tons/yr.

**b. 2 Unit Heaters and 1 Oven:**

The following calculations determine the unit heater and drying oven combustion emissions based on natural gas combustion, a combined maximum capacity of 0.35 MMBtu/hr, AP-42 emission factors, emissions before controls, and 8760 hours of operation.

$$0.35 \text{ MMBtu/hr} * 8760 \text{ hr/yr} * 1 \text{ E6 Btu/MMBtu} * 1/1000 \text{ cf/Btu} * 1/1 \text{ E6 MMcf/cf} * \text{Ef lb poll/MMcf} * 1/2000 \text{ ton poll/lb poll} = \text{ton poll/yr}$$

	PM 7.6 lb/MMcf	PM10 7.6 lb/MMcf	SO2 0.6 lb/MMcf	NOx 100 lb/MMcf	VOC 5.5 lb/MMcf	CO 84 lb/MMcf
<b>ton/yr</b>	<b>neg.</b>	<b>neg.</b>	<b>neg.</b>	<b>0.20</b>	<b>neg.</b>	<b>0.10</b>

### **EMISSIONS AFTER CONTROLS:**

The following is a summary of the modification's emissions after controls.

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Comb. HAPs (tons/yr)
Coating Booths	0.15	0.15	-	-	19.97	-	8.51
Combustion	neg.	neg.	neg.	0.20	neg.	0.10	neg.
<b>Total</b>	<b>0.15</b>	<b>0.15</b>	<b>neg.</b>	<b>0.20</b>	<b>19.97</b>	<b>0.10</b>	<b>8.51</b>

The only emissions controlled are the paint booth PM/PM10 emissions. The emissions are controlled by dry filter systems, each with a design control of 97%.

The following calculations determine the emissions after controls from the paint booth based on the emissions before controls, a design control efficiency of 97%, and 8760 hours of operation.

$$\text{PM/PM10 Emissions Before Controls (tons/yr)} * (1 - 0.97) = \text{tons (PM/PM10)/yr}$$

Coating	Emissions Before Controls (tons/yr)	% Control Efficiency	PM* (ton/yr)
Permaclad 2400	0.39	0.97	0.01
Coronado 80BSE	4.98	0.97	<b>0.15</b>
N6787	neg.	0.97	neg.
N4033	0.05	0.97	neg.
Toluene	0.00	0.97	<b>0.00</b>

\* PM10 is determined to be equal to PM.

The worst case PM coating and solvent emissions are 0.15 tons/yr and 0.00 tons/yr, respectively.

### **Potential To Emit**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA." This table reflects the PTE before controls due to the modification based on the above estimated emissions calculations. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	4.98
PM-10	4.98
SO <sub>2</sub>	neg.
VOC	19.97
CO	0.10
NO <sub>x</sub>	0.20

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

Pollutant	Potential To Emit (tons/year)
Ethylbenzene	0.12
MIK	0.08
Toluene	8.06
Xylene	0.25
Cobalt	neg.
Total Combined HAPs	8.51

The volatile organic compound (VOC) UPTE is greater than 10 tons per year, but less than 25 tons per year, no single HAP emissions exceed 10 tons/yr, and the combined HAP emissions are less than 25 tons/yr. Therefore, the source qualifies for a Registration pursuant to 326 IAC 2-5.5-1(b)(1)(C).

### County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM <sub>10</sub>	attainment or unclassifiable
SO <sub>2</sub>	attainment or unclassifiable
NO <sub>2</sub>	attainment or unclassifiable
Ozone	maintenance attainment
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration, 326 IAC 2-2 and 40 CFR 52.21.
- (b) Elkhart County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

**Source Status**

New Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

	<b>Source Potential to Emit After Controls</b> (tons/year)						
Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Comb. HAPs (tons/yr)
Coating Booths	0.15	0.15	-	-	19.97	-	8.51
Combustion	neg.	neg.	neg.	0.20	neg.	0.10	neg.
<b>Total</b>	<b>0.15</b>	<b>0.15</b>	<b>neg.</b>	<b>0.20</b>	<b>19.97</b>	<b>0.10</b>	<b>8.51</b>

  

PSD Major Source Levels	250	250	250	250	250	250	-
Part 70 Major Source Levels	-	100	100	100	100	100	10/25

- (a) This new source is not a major PSD stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more and it is not one of the 28 listed source categories.
- (b) This new source is not a Title V major stationary source because no criteria pollutant potential to emit (PTE) exceeds the applicable level of 100 tons/yr, no single hazardous air pollutant PTE exceeds the applicable levels of 10 tons/yr, and the combined hazardous air pollutant PTE does not exceed the applicable level of 25 tons/yr.

**Federal Rule Applicability**

**New Source Performance Standards (NSPS):**

There are no New Source Performance Standards (326 IAC 12 and 40 CFR Part 60) that apply to the proposed source.

**National Emission Standards for Hazardous Air Pollutants (NESHAPs):**

There are no National Emission Standards for Hazardous Air Pollutants (326 IAC 14 and 20 and 40 CFR Part 61 and 63) that apply to this proposed source.

## **State Rule Applicability**

### **Entire State Rule Applicability:**

#### **326 IAC 2-4.1 (HAP Major Sources)**

This source is not subject to the requirements of 326 IAC 2-4.1 because no single hazardous air pollutant (HAP) emissions exceed 10 tons per year, and the combined HAP emissions are less than 25 tons per year.

#### **326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Elkhart County and has VOC UPTe greater than 10 tons per year.

#### **326 IAC 5-1-2 (Opacity Limitations)**

Opacity shall not exceed an average of 40% in any one 6 minute averaging period. Opacity shall not exceed 60% for more than a cumulative total of fifteen minutes.

## **Individual State Rule Applicability**

### **326 IAC 6-3 (Process Operations), Paint Booth:**

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions from the paint booths shall not exceed the limits established utilizing the following equation:

$$E = 4.10 * P^{0.67}$$

where: E = rate of emission in pounds per hour,  
P = process weight in tons per hour

### **326 IAC 8-2-9 (Miscellaneous Metal Coating Operations):**

This paint booths are subject to 326 IAC 8-2-9 because the coatings applied at the booths generate daily VOC emissions greater than 15 pounds, metal parts are coated, the first two digits of the SIC code are 34, and the surface coating operation is not one of the exemptions under 326 IAC 8-2-9(b).

All coatings applied at this source are forced warm air dried at temperatures up to one hundred ninety-four degrees Fahrenheit (194°F).

The permit condition shall therefore be stated as follows:

Pursuant to 326 IAC 8-2-9, the owner or operator shall limit the volatile organic compound (VOC) content of the coatings applied to the metal parts and/or products at paint booths SV-1, SV-2, SV-3, SV-4, and SV-7, to three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

For the purposes of this Condition, forced warm air dried coatings are defined as coatings that are forced warm air dried at temperatures up to one hundred ninety-four degrees Fahrenheit (194°F).

The following are the VOC contents of the coatings as provided in the VOC data sheets.

lb/gal \* wt% organics / (1 - vol% H<sub>2</sub>O)

Coating	lb VOC/gal less H <sub>2</sub> O	Limit, lb VOC/gal. Less H <sub>2</sub> O
Permaclad 2400	2.1	<b>3.5</b>
Coronado 80BSE	1.8	<b>3.5</b>
N-5751	3.5	<b>3.5</b>
N4033	3.4	<b>3.5</b>

None of the as supplied coating VOC contents exceed the 326 IAC 8-2-9 forced warm air dried coating VOC content limit of 3.5 lb/gal, less water.

In addition, all solvents sprayed from the application equipment of the paint booth during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that minimizes evaporation.

To demonstrate compliance with the limits of 326 IAC 8-2-9, the owner or operator shall keep records of the as supplied and as applied VOC data sheets, making them available upon request.

## Conclusion

The construction and operation of this screw surface coating operation shall operated according to the requirements specified in registration No. **039-14864-00561**.